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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHN P. EVPAK, an Individual,

Plaintiffs,

v.

STATE OF NEVADA DEPARTMENT OF
TAXATION, a political subdivision of the
State of Nevada,

Defendant.

Case No. 3:22-cv-00073-MMD-CLB

STIPULATION, REQUEST, AND
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT

(THIRD REQUEST)

Defendant STATE OF NEVADA *ex rel.* its DEPARTMENT OF TAXATION (“Defendant” or “Taxation”) by and through its attorneys, AARON D. FORD, Attorney General for the State of Nevada, SCOTT H. HUSBANDS, Deputy Attorney General, pursuant to LR IA 6-1, LR IA 6-2, hereby submit their Stipulation, Request, and Order Extending Time to Answer or Otherwise Respond to Plaintiff’s Complaint. This is the third request for an extension of time to file an answer or otherwise respond to Plaintiff’s Complaint.

Plaintiff JOHN P. EVPAK (“Plaintiff” or “Mr. Evpak”), filed a Complaint (ECF No. 1) on February 7, 2022. Defendants were served the Complaint on February 16, 2022. The deadline for Defendants to answer or otherwise respond to the Complaint was March 8, 2022. Counsel met and conferred and agreed to extend that deadline to April 15, 2022. The Court

1 approved that stipulation and entered an order approving the stipulation. (ECF No. 7). At
2 Taxation's request, the parties sought a second extension for that deadline for the reasons set
3 forth in that stipulation. (ECF No. 8). The Court approved that agreement. (ECF No. 9). The
4 parties now seek an additional short extension of one week to accommodate several unexpected
5 client emergencies on the part of defense counsel. Additionally, Taxation will be adding a
6 second Deputy Attorney General to assist with this matter and some additional time is needed
7 for that attorney to help with preparing Taxation's responsive pleading. Counsel met and
8 conferred electronically on Friday May 6, 2022 and are in agreement to extend the deadline for
9 Taxation's responsive pleading to Friday, May 13, 2022.

10 Upon agreement by and between all the parties, through their respective counsel, the
11 undersigned counsel request that this Court grant Defendant an extension of time, up to and
12 including, May 13, 2022, to file an answer or otherwise respond by motion to Plaintiff's
13 Complaint.

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1 By entering into this stipulation, none of the parties waive any rights they have under
2 statute, law, or rule with respect to Plaintiff's Complaint.

3 DATED: May 6, 2022

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5 AARON D. FORD
Attorney General

HKM EMPLOYMENT ATTORNEYS, LLP

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7 By: /s/ Scott H. Husbands

By: /s/ Jenny L. Foley

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13 *Attorneys for State of Nevada ex. rel its*
14 *Department of Taxation*

15 **ORDER**

16 IT IS SO ORDERED.

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19 UNITED STATES MAGISTRATE JUDGE

20 Dated: May 9, 2022